

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LASHAWN BROWN,	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	
	:	No. 2:20-cv-05624
UNITED STATES POSTAL SERVICE,	:	
	:	
Defendant.	:	
	:	

DECLARATION OF SETH P. LYONS

I, Seth P. Lyons, hereby state, under penalty of perjury, that the following facts are true and correct:

1. I am a Supervising Attorney in the Employment Unit of Community Legal Services (“CLS”), 1424 Chestnut Street, Philadelphia, PA 19102, and I represent Plaintiff in the above-caption action.

2. I submit this declaration in order to provide the Court with information concerning the fee lodestar incurred by CLS during the litigation.

CLS’s Experience in the Field of Wage and Hour Litigation

3. CLS is a free legal services program founded in 1966 and is recognized as one of the preeminent legal services programs in the nation. Since its inception, CLS has helped over one million clients and continues to handle the individual cases of over 12,000 people per year in a variety of areas, including employment, public benefits, energy and utilities, family law, homeownership, consumer law, public and private house, and disabilities law. CLS and its attorneys regularly engage in complex litigation, class action lawsuits, high level policy work, community outreach, and media outreach in order to achieve its ultimate goal of ending poverty and

ensuring access to justice for all.

4. CLS's Employment Unit has handled over 33,000 employment cases since 1989, including nearly 2,500 wage and hour cases since 2000. This includes extensive litigation in state and federal court, as well as dozens of class and collective actions during this period.

CLS Attorneys' Individual Experience

5. **Seth Lyons** ("Lyons") is a Supervising Attorney in CLS's Employment Unit. He graduated from the University of California, Berkeley, School of Law in 2016. Lyons has represented hundreds of low-wage workers in different employment-related matters, including wage theft, employment discrimination, child abuse expunction, and criminal record-related barriers to employment. Lyons has handled over 80 wage and hour cases, including multiple class actions. Lyons is a member of the Pennsylvania bar and is also admitted to the United States District Court for the Eastern District of Pennsylvania.

6. **Elizabeth Soltan** ("Soltan") graduated cum laude from Harvard Law School in 2019. Soltan was a student attorney at the Harvard Legal Aid Bureau, where she represented clients in housing and wage cases and served as the Practice Group Leader for the wage practice. As a law student, Soltan successfully briefed and argued a workers' rights appeal before the Supreme Judicial Court of Massachusetts, the state's highest court. Soltan completed a two-year Skadden fellowship as a Staff Attorney at Community Legal Services of Philadelphia, where she represented low-income patient families in a Medical-Legal Partnership with the Children's Hospital of Philadelphia. While at Community Legal Services, Soltan was a member of the litigation team representing Pennsylvania food stamp recipients in *Gilliam v. USDA*. She also represented low-income Philadelphians in employment and public benefits matters. Soltan is a member of the Pennsylvania and New Jersey bars, and is also admitted to the United States District Court for the Eastern District of Pennsylvania.

CLS Attorneys' Hourly Rates

7. Community Legal Services has developed a standardized fee schedule for all of its attorneys based on years of experience. See <https://clsphila.org/about-cls/attorney-fees>. Under this fee schedule, our hourly billing rates have been established as follows:

- a. Seth Lyons (2016 graduation): \$275 per hour
- b. Elizabeth Soltan (2019 graduation): \$220 per hour

8. Throughout this litigation, CLS attorneys kept detailed, contemporaneous records of the time spent on this matter in six-minute increments.

9. CLS's work on this litigation is reflected in the contemporaneous time records below.

10. As indicated in the time records, CLS has spent **114.1 hours** and incurred a total fee lodestar of **\$28,766.00**.

NAME	TOTAL HOURS	HOURLY RATE	TOTAL
Seth Lyons	66.8	\$275	\$18,370.00
Elizabeth Soltan	47.3	\$220	\$10,406.00
TOTALS	114.1		\$28,766.00

I HEREBY DECLARE, UNDER PENALTY OF PERJURY THAT THE ABOVE STATEMENTS ARE TRUE AND CORRECT.

Date: October 25, 2021



Seth P. Lyons
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102

Timekeeping Log

Date of Service	Time Spent	Caseworker	Activity Details
03/23/2020	0.1	SETH LYONS	reviewing case and updating tasks
03/27/2020	0.2	SETH LYONS	researching FMLA
03/27/2020	0.5	SETH LYONS	PC w/ cl
03/30/2020	0.3	SETH LYONS	reviewing timesheets and emailing cl
03/31/2020	0.6	ELIZABETH SOLTAN	Researched FMLA coverage of USPS worker for Seth Lyons' question
04/03/2020	0.1	SETH LYONS	emailing cl
04/03/2020	0.3	SETH LYONS	discussing w/ paralegal
04/08/2020	0.1	SETH LYONS	reviewing case notes
04/13/2020	0.2	SETH LYONS	discussing with paralegal
04/13/2020	0.3	SETH LYONS	reviewing damages stuff and discussing with paralegal
04/14/2020	0.2	SETH LYONS	discussing with paralegal
04/21/2020	0.7	SETH LYONS	discussing w/ paralegal
04/22/2020	0.1	SETH LYONS	discussing with paralegal
04/22/2020	0.2	SETH LYONS	discussing with paralegal and reviewing notes
05/07/2020	0.2	SETH LYONS	discussing with paralegal
05/13/2020	0.1	SETH LYONS	discussing with paralegal
05/19/2020	0.1	SETH LYONS	researching FMLA issue and discussing with unit
05/19/2020	0.1	SETH LYONS	reviewing notes
05/22/2020	0.1	SETH LYONS	discussing with paralegal
05/27/2020	0.2	SETH LYONS	discussing with paralegal
05/27/2020	0.7	SETH LYONS	calculating damages, reviewing docs
05/28/2020	0.2	SETH LYONS	discussing with paralegal
06/05/2020	0.1	SETH LYONS	discussing with paralegal
06/05/2020	0.9	SETH LYONS	damages calculation and discussing with paralegal
06/08/2020	0.2	SETH LYONS	discussing with paralegal and using location mapping
06/09/2020	0.2	SETH LYONS	reviewing location data
06/10/2020	0.2	SETH LYONS	reviewing damages calculation and discussing with paralegal
06/25/2020	0.1	SETH LYONS	discussing with paralegal
06/25/2020	0.1	SETH LYONS	updating case notes
06/25/2020	0.1	SETH LYONS	discussing with paralegal
06/26/2020	0.3	SETH LYONS	revising opening ltr/retainer, sending to cl for signature
06/29/2020	0.1	SETH LYONS	updating file

07/02/2020	0.2	SETH LYONS	drafting demand letter
07/02/2020	0.3	SETH LYONS	calculating damages
07/02/2020	0.2	SETH LYONS	drafting demand letter
07/10/2020	0.3	SETH LYONS	drafting demand letter
07/11/2020	0.2	SETH LYONS	finalizing and mailing demand ltr
07/11/2020	0.3	SETH LYONS	drafting demand ltr and texting cl
07/29/2020	0.1	SETH LYONS	Calling opp atty
08/10/2020	0.3	SETH LYONS	PC w/ opp atty
08/10/2020	0.2	SETH LYONS	PC w/ opp atty
08/13/2020	0.3	SETH LYONS	PC w/ client
08/19/2020	0.2	SETH LYONS	emailing cl and opp atty
08/19/2020	0.1	SETH LYONS	emailing client and opp atty
08/24/2020	0.1	SETH LYONS	emailing client and opp atty
08/27/2020	0.1	SETH LYONS	emailing opp atty
09/02/2020	0.3	SETH LYONS	reviewing paystub from ER
09/22/2020	0.4	SETH LYONS	drafting email to opp atty, emailing cl
09/22/2020	0.4	SETH LYONS	PC w. opp atty
09/22/2020	0.4	SETH LYONS	reviewing wage calculation, ER docs, calling opp atty
09/23/2020	0.1	SETH LYONS	emailing cl and opp atty
10/01/2020	1	SETH LYONS	reviewing pay journal info
10/01/2020	0.2	SETH LYONS	emailing cl for backpay info
10/06/2020	0.5	SETH LYONS	PC w/ cl
10/08/2020	0.1	SETH LYONS	emailing cl
10/16/2020	0.5	SETH LYONS	calculating damages
10/19/2020	0.1	SETH LYONS	PC to cl
10/20/2020	0.2	SETH LYONS	emailing opp atty
10/26/2020	0.3	SETH LYONS	emailing opp atty, discussing with colleagues
11/02/2020	0.1	SETH LYONS	PC w/ cl
11/02/2020	1	SETH LYONS	researching FMLA issues and drafting complaint
11/02/2020	0.2	SETH LYONS	PC w/ cl
11/02/2020	0.3	SETH LYONS	discussing with colleagues
11/03/2020	1.2	SETH LYONS	drafting complaint, researching filing procedures
11/04/2020	0.1	SETH LYONS	texting cl
11/04/2020	0.7	SETH LYONS	drafting complaint, researching filing procedures, discussing with colleague
11/05/2020	0.3	SETH LYONS	preparing complaint materials
11/05/2020	0.2	SETH LYONS	discussing with co counsel
11/05/2020	0.5	ELIZABETH SOLTAN	Initial discussion of case with Seth Lyons
11/05/2020	0.3	SETH LYONS	discussing with co-counsel
11/05/2020	0.5	SETH LYONS	texting client and drafting complaint

11/06/2020	0.6	SETH LYONS	drafting complaint and discussing with co counsel
11/06/2020	1.9	SETH LYONS	drafting complaint, discussing with co-counsel, researching FLSA provisions
11/06/2020	2	ELIZABETH SOLTAN	consults with Seth, editing complaint in Sharepoint
11/09/2020	0.1	SETH LYONS	texting cl and preparing IFP
11/09/2020	0.4	SETH LYONS	drafting IFP, texting client, discussing with co counsel
11/09/2020	0.5	SETH LYONS	drafting complaint, texting client
11/09/2020	1.1	ELIZABETH SOLTAN	editing complaint, research on FMLA retaliation vs interference
11/10/2020	0.4	SETH LYONS	finalizing documents for filing
11/10/2020	0.7	SETH LYONS	finalizing filing forms, sending to client for signature
11/10/2020	0.3	SETH LYONS	organizing exhibits, researching service rules
11/10/2020	0.6	SETH LYONS	preparing court filings, discussing with co counsel
11/10/2020	0.3	SETH LYONS	drafting complaint, discussing with co counsel
11/10/2020	2	ELIZABETH SOLTAN	research on fmla claims, completing forms for filing
11/11/2020	0.4	SETH LYONS	filing complaint and IFP
11/12/2020	0.3	SETH LYONS	researching service rules, calling chambers, emailing opposing attorney
11/12/2020	0.2	SETH LYONS	looking up docket and calling chambers re service issue
11/12/2020	0.1	SETH LYONS	call to clerk's office
11/12/2020	1	ELIZABETH SOLTAN	researching service issues, etc
11/13/2020	0.5	ELIZABETH SOLTAN	Looked into service question, left message for clerk
11/13/2020	0.1	SETH LYONS	discussing service issues with co counsel
11/13/2020	0.1	SETH LYONS	discussing with co counsel
11/17/2020	0.2	SETH LYONS	discussing service with co counsel
12/07/2020	0.2	SETH LYONS	Checking docket, calling clerk
12/09/2020	0.4	SETH LYONS	filling out summons form
12/23/2020	0.1	SETH LYONS	checking certified mail receipt
01/08/2021	0.2	SETH LYONS	pc to us marshals
01/12/2021	0.1	SETH LYONS	emailing opp atty
01/13/2021	0.1	SETH LYONS	emailing opp atty
01/15/2021	0.1	ELIZABETH SOLTAN	LM at civil process VM
01/15/2021	0.1	SETH LYONS	discussing with co-counsel
01/26/2021	0.2	ELIZABETH SOLTAN	TCT US Marshals re: service

01/29/2021	0.2	SETH LYONS	discussing with co counsel and calling clerk
01/29/2021	0.2	ELIZABETH SOLTAN	Discussed case w/ Seth and LM for US Marshals
02/03/2021	0.2	SETH LYONS	calling court and marshal
02/08/2021	0.3	ELIZABETH SOLTAN	Conversation with Nicole Philippi
02/08/2021	0.2	SETH LYONS	discussing with co counsel
02/08/2021	0.2	ELIZABETH SOLTAN	Calling Clerk and US Marshals
02/08/2021	0.1	SETH LYONS	discussing with co-counsel
02/09/2021	0.2	ELIZABETH SOLTAN	TCT Nicole Philippi
02/10/2021	0.1	ELIZABETH SOLTAN	scheduling conversations with Seth
02/10/2021	0.2	SETH LYONS	discussing with co counsel and emailing opp atty
02/11/2021	0.2	SETH LYONS	call w/ opposing attorney
02/11/2021	0.1	SETH LYONS	emailing opp atty
02/12/2021	0.8	SETH LYONS	legal research on immunity issue, discussing with co counsel
02/15/2021	0.6	SETH LYONS	legal research and calling/emailing opposing attorney
02/16/2021	0.3	SETH LYONS	discussing with co-counsel and calling client
02/18/2021	0.2	SETH LYONS	reviewing orders, researching affirmative defense issue
02/18/2021	0.2	SETH LYONS	reviewing answer
02/24/2021	1.2	SETH LYONS	drafting rule 26a disclosures; researching min wage calculation; calculating damages
02/25/2021	0.2	SETH LYONS	drafting initial disclosures
02/25/2021	0.4	SETH LYONS	drafting amended complaint
02/25/2021	1	SETH LYONS	damages calculation
02/26/2021	0.4	SETH LYONS	drafting amended complaint, reviewing answer
02/26/2021	0.3	SETH LYONS	PC w/ cl
02/26/2021	0.1	SETH LYONS	calling client
02/28/2021	0.1	SETH LYONS	drafting amended complaint
03/01/2021	1.3	SETH LYONS	emailing opposing attorney, texting client, drafting initial disclosures and organizing documents
03/01/2021	0.2	SETH LYONS	calling cl
03/01/2021	0.2	SETH LYONS	texting client and calculated damages
03/01/2021	0.2	SETH LYONS	discussing with co counsel
03/01/2021	0.2	SETH LYONS	texting client, drafting amended complaint and initial disclosures
03/01/2021	0.3	SETH LYONS	reviewing stips, discussing with co-counsel, drafting 26(a) disclosures

03/01/2021	1.5	ELIZABETH SOLTAN	reviewed stips, amended complaint, 26f; discussed w/ Seth; researched willfulness
03/02/2021	0.2	SETH LYONS	emailing initial disclosures
03/03/2021	0.3	SETH LYONS	finalizing and filing amended complaint
03/03/2021	0.2	SETH LYONS	reviewing initial disclosures, texting client
03/03/2021	0.1	SETH LYONS	emailing client amended complaint to review, and verification to sign
03/03/2021	0.1	SETH LYONS	finalizing amended complaint and texting client
03/03/2021	0.2	SETH LYONS	emailing opposing attorney and discussing 26(f) conference with co-counsel
03/03/2021	0.3	ELIZABETH SOLTAN	Read ER disclosures
03/03/2021	0.6	ELIZABETH SOLTAN	research on 26f report procedures
03/05/2021	0.2	SETH LYONS	discussing discovery with co-counsel and reviewing initial disclosures
03/05/2021	0.4	SETH LYONS	rule 26f conference
03/05/2021	1.5	ELIZABETH SOLTAN	Reviewed complaint and answer and drafted 26f report
03/05/2021	0.3	ELIZABETH SOLTAN	Rule 26 Conference w/ Eric Gill and Desiree Wilkins
03/07/2021	0.3	SETH LYONS	reviewing 26(f) report
03/08/2021	0.1	SETH LYONS	discussing with co counsel
03/08/2021	0.4	ELIZABETH SOLTAN	Finalized and sent draft Rule 26f Report to OC
03/08/2021	0.1	ELIZABETH SOLTAN	email to Seth re: tracked changes
03/10/2021	0.1	SETH LYONS	reviewing scheduling order and updating case calendar
03/10/2021	0.2	SETH LYONS	filing rule 26 report
03/10/2021	0.2	SETH LYONS	reviewing 26f report and discussing with co counsel
03/10/2021	0.4	ELIZABETH SOLTAN	emails with OC re: 26f conference report
03/11/2021	0.1	SETH LYONS	discussing with co counsel
03/11/2021	0.1	ELIZABETH SOLTAN	LM for Nicole Philippi
03/11/2021	1.1	ELIZABETH SOLTAN	Filing notice of appearance in CM/ECF (some issues occurred)
03/15/2021	0.5	SETH LYONS	discussing discovery with co counsel
03/15/2021	0.1	SETH LYONS	discussing discovery with co counsel
03/15/2021	0.5	ELIZABETH SOLTAN	Phone call with Seth for discovery planning
03/18/2021	0.7	SETH LYONS	drafting discovery requests
03/19/2021	0.1	SETH LYONS	discussing discovery with co counsel
03/22/2021	0.1	SETH LYONS	discussing with co counsel
03/23/2021	0.1	SETH LYONS	reviewing answer to amended complaint

03/26/2021	1.5	ELIZABETH SOLTAN	drafting interrogatories and RFP
03/26/2021	0.6	SETH LYONS	drafting discovery, reviewing discovery requests, emailing opposing counsel
03/29/2021	1.6	SETH LYONS	drafting, finalizing and serving discovery requests
03/29/2021	1.3	ELIZABETH SOLTAN	Editing interrogatories and RFP
03/30/2021	0.5	SETH LYONS	calling cl
03/30/2021	0.1	SETH LYONS	discussing discovery responses with co counsel
03/30/2021	0.6	ELIZABETH SOLTAN	Preparing medical records request to sign
03/30/2021	0.4	ELIZABETH SOLTAN	TCT CL along with Seth - see Seth's notes
04/01/2021	0.4	SETH LYONS	emailing client discovery request info
04/01/2021	0.6	ELIZABETH SOLTAN	Faxed medical records request to Einstein
04/05/2021	0.2	SETH LYONS	reviewing medical records and discussing with co-counsel
04/05/2021	0.1	ELIZABETH SOLTAN	TCT CL
04/05/2021	0.2	ELIZABETH SOLTAN	Call to Einstein Medical Records 215-456-6800
04/05/2021	0.3	ELIZABETH SOLTAN	Received and reviewed medical records from Einstein
04/06/2021	0.1	SETH LYONS	reviewing medical records
04/07/2021	0.1	SETH LYONS	texting client about discovery
04/07/2021	0.2	ELIZABETH SOLTAN	Reviewed medical records
04/08/2021	0.2	SETH LYONS	discussing discovery with co counsel
04/08/2021	0.1	ELIZABETH SOLTAN	TCT CL
04/13/2021	0.2	SETH LYONS	texting cl and emailing opp atty
04/13/2021	0.1	SETH LYONS	calling cl
04/14/2021	0.2	SETH LYONS	emailing opp atty, texting client, discussing discovery with co counsel
04/17/2021	0.5	SETH LYONS	drafting discovery responses
04/19/2021	0.1	SETH LYONS	discovery responses
04/19/2021	0.2	SETH LYONS	drafting discovery responses
04/20/2021	0.2	SETH LYONS	discussing with co counsel
04/20/2021	0.8	SETH LYONS	discovery responses; discussing with co counsel
04/20/2021	0.5	ELIZABETH SOLTAN	Prepared updated Einstein form and CAO form
04/22/2021	0.1	SETH LYONS	discussing discovery with co counsel
04/29/2021	1	ELIZABETH SOLTAN	Reviewing doc requests
05/05/2021	0.1	SETH LYONS	calling, texting, emailing
05/06/2021	0.1	SETH LYONS	pc to cl
05/07/2021	0.1	SETH LYONS	calling cl
05/10/2021	0.3	SETH LYONS	discussing discovery responses with co counsel

05/10/2021	1	SETH LYONS	call w/ cl
05/10/2021	1.5	ELIZABETH SOLTAN	TCT CL, working on docs
05/11/2021	0.2	SETH LYONS	drafting discovery responses
05/11/2021	0.1	SETH LYONS	discussing discovery with co counsel
05/11/2021	0.1	SETH LYONS	discussing discovery with co counsel
05/11/2021	0.9	ELIZABETH SOLTAN	Call w/ CL
05/12/2021	0.1	SETH LYONS	discussing discovery with co counsel
05/12/2021	0.2	SETH LYONS	drafting discovery responses
05/12/2021	0.1	SETH LYONS	discussing discovery with co counsel
05/12/2021	1.5	ELIZABETH SOLTAN	discovery responses
05/12/2021	0.5	ELIZABETH SOLTAN	call with client
05/13/2021	0.1	SETH LYONS	discussing discovery with co counsel
05/13/2021	1	ELIZABETH SOLTAN	working on discovery responses
05/13/2021	1.8	ELIZABETH SOLTAN	Reviewing docs from CAO for disco
05/14/2021	0.3	SETH LYONS	working on discovery responses
05/14/2021	0.3	SETH LYONS	drafting discovery responses
05/14/2021	2.3	ELIZABETH SOLTAN	discovery drafting
05/14/2021	1.3	ELIZABETH SOLTAN	Discovery
05/14/2021	2	ELIZABETH SOLTAN	Disco work, TCT CL, sending med records request
05/16/2021	0.9	SETH LYONS	drafting discovery responses
05/16/2021	1.8	ELIZABETH SOLTAN	P's docs for discovery
05/16/2021	2.1	ELIZABETH SOLTAN	P's docs for discovery
05/17/2021	0.6	SETH LYONS	finalizing discovery responses, discussing with co counsel, emailing opp attorney
05/17/2021	0.1	SETH LYONS	emailing client
05/17/2021	0.2	SETH LYONS	discussing discovery with co counsel
05/17/2021	0.4	SETH LYONS	drafting responses and calling client
05/17/2021	0.4	ELIZABETH SOLTAN	TCT CL to review doc responses
05/17/2021	0.6	ELIZABETH SOLTAN	Editing doc responses
05/18/2021	0.1	SETH LYONS	discussing with co counsel
05/18/2021	0.1	ELIZABETH SOLTAN	Email to opposing counsel re receipt of disco
05/19/2021	0.1	SETH LYONS	discussing discovery with co counsel
05/19/2021	0.2	SETH LYONS	discussing tax returns with co counsel
05/19/2021	0.5	ELIZABETH SOLTAN	saving tax records and checking them
05/19/2021	0.1	ELIZABETH SOLTAN	call to client
05/20/2021	0.2	SETH LYONS	emailing about UC claim
05/20/2021	0.1	SETH LYONS	emailing cl
06/01/2021	0.2	SETH LYONS	reviewing discovery, discussing with co-counsel
06/01/2021	0.1	ELIZABETH SOLTAN	scheduling emails with OC
06/01/2021	0.2	SETH LYONS	discussing with co counsel
06/02/2021	0.2	SETH LYONS	discussing discovery with co counsel

06/02/2021	0.3	ELIZABETH SOLTAN	trying to add up fmla hours from disco
06/02/2021	0.9	ELIZABETH SOLTAN	reviewing discovery from usps
06/03/2021	0.1	SETH LYONS	call w/ cl
06/03/2021	0.6	SETH LYONS	reviewing discovery, discussing with co-counsel
06/04/2021	0.7	SETH LYONS	call w/ opp atty, discussing with co counsel
06/04/2021	0.4	ELIZABETH SOLTAN	discussing next steps with Seth Lyons
06/04/2021	0.3	ELIZABETH SOLTAN	Call w/ Eric Gill and Desiree Wilkins
06/07/2021	0.3	SETH LYONS	reviewing discovery with co counsel
06/07/2021	0.1	SETH LYONS	discussing damages calculations with co-counsel
06/07/2021	1.2	ELIZABETH SOLTAN	reviewing discovery and timesheets for damages calculation
06/07/2021	1	ELIZABETH SOLTAN	calculating accuracy of damages estimates based on training hours
06/10/2021	0.1	SETH LYONS	discussing with co counsel
06/11/2021	0.1	SETH LYONS	emailing opp atty
06/16/2021	0.1	SETH LYONS	discussing with co counsel
06/16/2021	2.9	SETH LYONS	reviewing discovery, calculating damages
06/16/2021	1.7	ELIZABETH SOLTAN	analyzing discovery docs against other records
06/22/2021	0.5	SETH LYONS	damages calculation and calling cl
06/22/2021	0.2	SETH LYONS	damages calculations
06/24/2021	0.3	SETH LYONS	PC w/ opp atty
06/24/2021	0.7	SETH LYONS	calculating damages, discussing with co-counsel, calling opposing attorney
06/24/2021	0.4	ELIZABETH SOLTAN	Call w/ Seth re: negotiation strategy
07/09/2021	0.1	SETH LYONS	emailing opp atty
07/12/2021	0.1	SETH LYONS	PC to cl
07/12/2021	0.2	SETH LYONS	call w opp atty and discussing with co-counsel
07/13/2021	0.1	SETH LYONS	call w/ opp atty
07/13/2021	0.1	SETH LYONS	calling opp atty
07/15/2021	0.1	SETH LYONS	call w opp atty and discussing with co counsel
07/15/2021	0.1	SETH LYONS	call to opp atty
07/19/2021	0.1	SETH LYONS	discussing with co counsel and PC w cl
07/20/2021	0.1	SETH LYONS	call w/ opp counsel
07/20/2021	0.1	SETH LYONS	calling opp atty
07/22/2021	0.1	SETH LYONS	calling opp atty
07/23/2021	0.1	SETH LYONS	calling opp atty
07/27/2021	0.4	SETH LYONS	PC w/ opp atty and calling cl, reviewing consent order rules

07/28/2021	0.5	SETH LYONS	emailing opp atty, researching consent decree law
08/16/2021	0.1	SETH LYONS	texting cl about UC claim
08/24/2021	0.1	SETH LYONS	emailing opp atty
08/25/2021	0.1	SETH LYONS	texting cl
09/08/2021	0.1	SETH LYONS	emailing opposing counsel
09/10/2021	0.3	SETH LYONS	reviewing settlement agreement, emailing opposing attorney
09/13/2021	0.6	SETH LYONS	revising settlement agreement, emailing opposing attorney
09/15/2021	0.2	SETH LYONS	emailing opposing attorney re settlement language
09/15/2021	0.3	SETH LYONS	reviewing settlement agreement with client
09/15/2021	0.2	SETH LYONS	revising settlement agreement, emailing opposing attorney, texting client
09/16/2021	0.1	SETH LYONS	discussing settlement issue with colleague
09/20/2021	0.1	SETH LYONS	drafting consent decree
09/28/2021	0.2	SETH LYONS	reviewing settlement agreement, emailing opposing attorney
09/30/2021	0.3	SETH LYONS	reviewing and executing settlement agreement, emailing client
10/04/2021	0.3	SETH LYONS	emailing opp attorney, drafting consent order
10/07/2021	0.2	SETH LYONS	filing consent order and settlement w/ court
10/07/2021	0.2	SETH LYONS	finalizing consent order, emailing opp atty